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Attorneys for Plaintiffs, the Collective,
and putative Classes

Additional Counsel on the following page

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

PAUL MONPLAISIR, JACKY CHARLES,
and STERLING FRANCOIS, on behalf of
themselves and all others similarly situated,

Plaintiffs,

vs.

INTEGRATED TECH GROUP, LLC and
ITG COMMUNICATIONS LLC,

Defendants.

Case No. 3:19-cv-01484-WHA

**NOTICE OF FILING OF CONSENTS TO
JOIN COLLECTIVE ACTION**

Judge: Hon. William Alsup

Complaint Filed: March 21, 2019

Trial Date: None

1 Sarah R. Schalman-Bergen (admitted *pro hac vice*)
2 Stacy Savett (*pro hac vice* to be submitted)
3 Shoshana Savett (*pro hac vice* to be submitted)
4 BERGER MONTAGUE PC
5 1818 Market Street, Suite 3600
6 Philadelphia, Pennsylvania 19103
7 Telephone: (215) 875-3000
8 Facsimile: (215) 875-4604

9 Attorneys for Plaintiffs, the Collective,
10 and putative Classes
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NOTICE OF FILING CONSENTS TO JOIN COLLECTIVE ACTION

Plaintiffs Paul Monplaisir, Jacky Charles, and Sterling Francois, individually and on behalf of all persons similarly situated, hereby file the following Opt-In Consent Forms, submitted herewith as Exhibits 1 through 3, pursuant to the Fair Labor Standards, Act, 29 U.S.C. §§ 201, *et seq.*

CONSENTS TO JOIN COLLECTIVE ACTION

EXHIBIT NUMBER	NAME	OPT-IN NUMBER
1	Daniel Jean	33
2	Dimitri Hilaire	34
3	Orlando Hughley	35

Date: April 16, 2019

Respectfully submitted,

/s/ Carolyn H. Cottrell

Carolyn H. Cottrell

Ori Edelstein

Michelle S. Lim

SCHNEIDER WALLACE

COTTRELL KONECKY

WOTKYNS LLP

Sarah R. Schalman-Bergen (admitted *pro hac vice*)

Stacy Savett (*pro hac vice* to be submitted)

Shoshana Savett (*pro hac vice* to be submitted)

BERGER & MONTAGUE, P.C.

Attorneys for Plaintiffs, the Collective,
and putative Classes

CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the foregoing document with the Clerk of the Court for the United States District Court, Northern District of California, by using the Court's CM/ECF system on April 16, 2019.

I further certify that copies of the filed, foregoing document will be served upon the opposing parties via U.S. mail at the addresses listed below:

Integrated Tech Group, LLC
c/o Corporation Service Company d/b/a CSC-Lawyers Inc. Service (Registered Agent)
2710 Gateway Oaks, Suite 150N
Sacramento, California 95833

ITG Communications LLC
c/o Mike Brooks (Registered Agent)
1531 Hunt Club Boulevard, Suite 210
Gallatin, Tennessee 37066

Date: April 16, 2019

Respectfully submitted,

/s/ Carolyn H. Cottrell

Carolyn H. Cottrell
Ori Edelstein
Michelle S. Lim
SCHNEIDER WALLACE
COTTRELL KONECKY
WOTKYNS LLP

Sarah R. Schalman-Bergen (admitted *pro hac vice*)
Stacy Savett (*pro hac vice* to be submitted)
Shoshana Savett (*pro hac vice* to be submitted)
BERGER & MONTAGUE, P.C.

Attorneys for Plaintiffs, the Collective,
and putative Classes

EXHIBIT 1

OPT-IN CONSENT FORM

Paul Monplaisir v. Integrated Tech Group, LLC (ITG)
United States District Court, Northern District of California

Complete And Submit To:

Carolyn Hunt Cottrell, Esq.
 SCHNEIDER WALLACE
 COTTRELL KONECKY
 WOTKYNs LLP
 2000 Powell Street, Suite 1400
 Emeryville, California 94608

OR

Sarah R. Schalman-Bergen
 BERGER & MONTAGUE, P.C.
 1818 Market Street, 36th Floor
 Philadelphia, Pennsylvania 19103

Name: Daniel Jean _____ (Please Print)	Date of Birth: _____
Address: _____	Phone No. 1: _____ Phone No. 2: _____ E-mail Address: _____

CONSENT TO JOIN COLLECTIVE ACTION

Pursuant to the Fair Labor Standards Act, 29 U.S.C. §§ 201, *et seq.*

- I consent and agree to pursue my claims relating to and arising from Defendant Integrated Tech Group (ITG) alleged violations of the Fair Labor Standards Act, 29 U.S.C. §§ 201, *et seq.* in connection with the above-referenced litigation.
- I have worked as a/an **(title)** TECHNICIAN for Defendant in **(city, state)** POMPANO BEACH FL from approximately on or about **(date)** 06/8/2017 to approximately on or about **(date)** CURRENT.
- I understand that this litigation has been filed as a proposed collective action under the Fair Labor Standards Act of 1938, as amended, 29 U.S.C. §§ 201, *et seq.* I hereby consent, agree, and opt-in to become a Plaintiff herein and be bound by any judgment of the Court or any settlement of this action.
- I specifically authorize my attorneys, Schneider Wallace Cottrell Konecky Wotkyns and Berger & Montague to prosecute this lawsuit on my behalf and to negotiate a settlement of any and all claims I have against the Defendant in this litigation.

<u>4/14/2019</u> (Date Signed)	DocuSigned by:  9A2C8AE353E5424... (Signature)
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****IMPORTANT NOTE****

Statute of Limitations concerns mandate that you return this form as soon as possible to preserve your rights.

EXHIBIT 2

OPT-IN CONSENT FORM


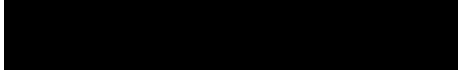
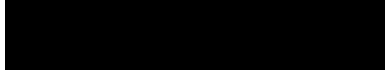


Paul Monplaisir v. Integrated Tech Group, LLC (ITG)
United States District Court, Northern District of California

Complete And Submit To:

Carolyn Hunt Cottrell, Esq.
 SCHNEIDER WALLACE
 COTTRELL KONECKY
 WOTKYNs LLP
 2000 Powell Street, Suite 1400
 Emeryville, California 94608

OR

Sarah R. Schalman-Bergen
 BERGER & MONTAGUE, P.C.
 1818 Market Street, 36th Floor
 Philadelphia, Pennsylvania 19103

Name: Dimitri Hilaire _____ (Please Print)	Date of Birth: 
Address: 	Phone No. 1:  Phone No. 2:  E-mail Address: 

CONSENT TO JOIN COLLECTIVE ACTION

Pursuant to the Fair Labor Standards Act, 29 U.S.C. §§ 201, *et seq.*

- I consent and agree to pursue my claims relating to and arising from Defendant Integrated Tech Group (ITG) alleged violations of the Fair Labor Standards Act, 29 U.S.C. §§ 201, *et seq.* in connection with the above-referenced litigation.
- I have worked as a/an **(title)** Technician for Defendant in **(city, state)** North Lauderdale Florida from approximately on or about **(date)** 07/2017 to approximately on or about **(date)** Present.
- I understand that this litigation has been filed as a proposed collective action under the Fair Labor Standards Act of 1938, as amended, 29 U.S.C. §§ 201, *et seq.* I hereby consent, agree, and opt-in to become a Plaintiff herein and be bound by any judgment of the Court or any settlement of this action.
- I specifically authorize my attorneys, Schneider Wallace Cottrell Konecky Wotkyns and Berger & Montague to prosecute this lawsuit on my behalf and to negotiate a settlement of any and all claims I have against the Defendant in this litigation.

4/14/2019 _____ (Date Signed)	DocuSigned by:  2B01D867019C49E... (Signature)
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****IMPORTANT NOTE****

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EXHIBIT 3

OPT-IN CONSENT FORM

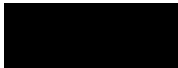
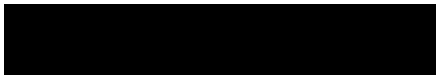

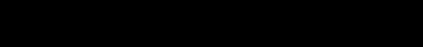
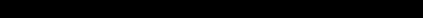
Paul Monplaisir v. Integrated Tech Group, LLC (ITG)
United States District Court, Northern District of California

Complete And Submit To:

Carolyn Hunt Cottrell, Esq.
 SCHNEIDER WALLACE
 COTTRELL KONECKY
 WOTKYNs LLP
 2000 Powell Street, Suite 1400
 Emeryville, California 94608

OR

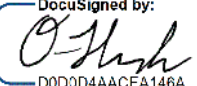
Sarah R. Schalman-Bergen
 BERGER & MONTAGUE, P.C.
 1818 Market Street, 36th Floor
 Philadelphia, Pennsylvania 19103

Name: Orlando Hughley _____ (Please Print)	Date of Birth: 
Address: 	Phone No. 1:  Phone No. 2:  E-mail Address: 

CONSENT TO JOIN COLLECTIVE ACTION

Pursuant to the Fair Labor Standards Act, 29 U.S.C. §§ 201, *et seq.*

- I consent and agree to pursue my claims relating to and arising from Defendant Integrated Tech Group (ITG) alleged violations of the Fair Labor Standards Act, 29 U.S.C. §§ 201, *et seq.* in connection with the above-referenced litigation.
- I have worked as a/an **(title)** Technician for Defendant in **(city, state)** Montgomery, AL Florida from approximately on or about **(date)** 11/28/2018 to approximately on or about **(date)** Current.
- I understand that this litigation has been filed as a proposed collective action under the Fair Labor Standards Act of 1938, as amended, 29 U.S.C. §§ 201, *et seq.* I hereby consent, agree, and opt-in to become a Plaintiff herein and be bound by any judgment of the Court or any settlement of this action.
- I specifically authorize my attorneys, Schneider Wallace Cottrell Konecky Wotkyns and Berger & Montague to prosecute this lawsuit on my behalf and to negotiate a settlement of any and all claims I have against the Defendant in this litigation.

<u>4/15/2019</u> _____ (Date Signed)	DocuSigned by:  D0D0D4AACEA146A... _____ (Signature)
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